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CHINA NORTHEAST
PETROLEUM HOLDINGS LIMITED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

vs.

CHINA NORTHEAST PETROLEUM HOLDINGS
LIMITED; WANG HONGJUN, (a/k/a Hongjun
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG
CHAO (a/k/a/ Chao Jiang)

Defendants,

JIANG MENG FU (a/k/a Mingfu Jiang); and SUN
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

No. 12-CV-8696 (NRB)
ECF

**NOTICE OF MOTION TO
DISMISS COUNTS ONE AND TWO
OF THE COMPLAINT**

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying declaration of Jaime J. Santos dated April 12, 2013 and the exhibits attached to the declaration, this notice, the accompanying memorandum of law in support of this motion, any subsequent submissions that shall be made in support of this motion, and all prior proceedings, the undersigned, on behalf of Defendants China North East Petroleum Holdings Limited (“NEP”), will move this Court, before the Honorable

Naomi Reice Buchwald, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court for an order: i) dismissing Counts One and Two of the Complaint with prejudice as to PwC in the above-referenced action pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6); and ii) for such other and further relief as the Court deems just and proper. NEP respectfully requests oral argument be heard on this motion.

Dated: April 12, 2013

Respectfully Submitted,

By: /s/ Michael J. Coffino

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